

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE TESLA INC. STOCKHOLDER
DERIVATIVE LITIGATION

§ Lead Case No. 1:22-cv-00592-LY

§ (Consolidated with Case No. 1:22-cv-00611-
§ LY)

This Document Relates To:

All Cases

**DECLARATION OF SHANE P. SANDERS IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS AMENDED
CONSOLIDATED COMPLAINT**

I, Shane P. Sanders, hereby declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of California. I was admitted to practice *pro hac vice* before this Court on August 4, 2022. I am a partner at Robbins LLP, co-lead counsel for plaintiff Alvin Janklow in the above-captioned action. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motion to Dismiss Amended Consolidated Complaint. I have knowledge of the matters stated herein and, should I be called upon, I could and would testify competently thereto.

2. Attached as Exhibit A is true and correct copy of *Tornetta v. Musk*, C.A. No. 2018-0408-KSJM, slip op. (Del. Ch. Jan. 30, 2024) (unpublished).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of February, 2024.

/s/ Shane P. Sanders
SHANE P. SANDERS (*pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2024, that I have served a true and correct copy of the foregoing document upon each attorney of record.

/s/ Shane P. Sanders

SHANE P. SANDERS